

**UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Bruce E. Bates, Sr.	:	Chapter 13
		:	
	Debtor	:	
CrossCountry Mortgage, LLC		:	
Movant		:	Bankruptcy Case Number
		:	24-10737 AMC
		:	
v.		:	
		:	
Bruce E. Bates, Sr.		:	
		:	
Respondent/Debtor		:	
And		:	
Kenneth E. West, Esquire		:	
Trustee		:	

**Debtor's Response to the Motion of CrossCountry Mortgage, LLC
for Relief from the Automatic Stay**

Debtor, **Bruce E. Bates, Sr.**, by and through his counsel, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this response to the Motion for Relief of CrossCountry Mortgage, LLC and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.
4. ADMITTED.
5. ADMITTED.
6. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

7. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

8. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

9. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

10. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

11. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

WHEREFORE, Debtor, **Bruce E. Bates, Sr.**, requests this Honorable Court deny the motion of CrossCountry Mortgage, LLC for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

\s\ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Attorney for Debtor